

**EXHIBIT EE**

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CLIENT/MATTER NUMBER  
085437-3044

August 29, 2006

**VIA FACSIMILE AND U.S. MAIL**

Kristy Sermersheim  
Executive Secretary  
SEIU Local 715  
2302 Zanker Road  
San Jose, CA 95131-1115

**Re: SEIU Local 715 and SEIU-UHW Representation Issues**

Dear Ms. Sermersheim:

Stanford Hospital & Clinics and Lucile Packard Children's Hospital have received and reviewed the "service agreement," copies of which both Greg Pullman and your counsel forwarded. From a review of that document, as well as a review of other documents relating to purported SEIU Local 715 representation by SEIU-UHW representatives, and a comparison of the scope of the duties and relationships between the two organizations as outlined in the agreement provided against the activities engaged in by the persons apparently assigned by SEIU-UHW to the Hospitals, the Hospitals do not believe that the actual arrangements between the unions comport with those set forth in the document. Accordingly, the Hospitals reconfirm their previous communication to Mr. Pullman that they do not recognize the purported service agreement; nor do they recognize as representatives of SEIU Local 715 any personnel from SEIU-UHW.

As also previously communicated to Mr. Pullman, if you wish to assign personnel employed directly by SEIU Local 715 to provide representational functions on behalf of the employees represented exclusively by SEIU Local 715, please notify the Hospitals of the names of those employees of SEIU Local 715. Until then, the Hospitals will continue to abide by their duty to recognize and deal with SEIU Local 715 through the stewards appointed by SEIU Local 715.

In the past, the Hospitals have forwarded correspondence received from SEIU-UHW personnel to Mr. Pullman and have directed responses thereto to him as well, as if the correspondence was received from him initially. In response, they receive further correspondence from the SEIU-UHW personnel. Going forward, and effective immediately, all future correspondence, purported grievances, referrals to arbitration and other communications received from any individuals other than Local 715 employees, designated stewards (or individual employees in the bargaining unit as contemplated by Article 26. with respect to the filing and informal

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resolution of grievances) will be disregarded as not properly sent on behalf of Local 715. In order to avoid problems in resolving issues properly addressed between the Hospitals and the bargaining representative of the unit employees, and to avoid missing the deadlines on grievances, etc., please have the stewards handle all communications regarding such matters unless and until you appoint SEIU Local 715 personnel to handle such matters. Please also advise whether you would like inquiries, notices and other communications initiated by the Hospitals on matters that fall within the realm of collective bargaining or the parties' contractual commitments and obligations, to be directed to you, to Mr. Pullman, to the stewards, or to some other Local 715 employee.

Finally, this is also to advise that the Hospitals will not participate in any meetings or proceeding attended by persons who are employed by SEIU-UHW, and that the Hospitals do not recognize employees of SEIU-UHW as representatives of SEIU Local 715 for purposes of access to Hospital premises.

The Hospitals understand that a reorganization is being imposed upon the various locals of SEIU in California by the International, and that you may have little flexibility or autonomy in these matters, which appear to have been already determined at the International level. However, the Hospitals are obligated to recognize SEIU Local 715, and only SEIU Local 715, as the exclusive representative of the unit employees unless and until proper steps have been taken to change the representative, and doing so *de facto* through a purported service agreement is not the appropriate method.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Laurence R. Arnold', written over a horizontal line.

Laurence R. Arnold

LRA:sey

cc: Laurie Quintel



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| CC:   | PHONE #:       | FAX #:         |
| Laurie Quintel<br>Stanford Hospital & Clinics | (650) 725-2770 | (650) 723-2370 |

**From :** Laurence R. Arnold

**Email Address :** larnold@foley.com

**Sender's Direct Dial :** 415.984.9819

**Date :** August 29, 2006

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